BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Application Of the Commission on its Own Motion, To Seek Comment on the Establishment Implementation and Monitoring of Service Quality Standards in the Provisioning of Wholesale Services by Incumbent Local Exchange Carriers To Their Wholesale Customers	)))))))))	Application No. C-2248/PI-37

INITIAL COMMENTS OF U S WEST COMMUNICATIONS, INC.

I. INTRODUCTION

In its Order Opening Docket and Seeking Comment, entered March 21, 2000, the Nebraska Public Service Commission ("Commission") indicated that this docket was being:

> opened to investigate and seek comment concerning the establishment of performance standards, appropriate measures of adequacy within those standards and reporting requirements that should be enacted for incumbent carriers in the provisioning of services to their wholesale customers.

U S WEST Communications, Inc. ("U S WEST") presents these initial comments regarding the scope of the Commission's investigation, the three specific topics about which the Commission specified its request for comments, and the additional topic of enforcement of Commission required standards for wholesale services performance.

II. PERFORMANCE STANDARDS IMPOSED ONLY UPON THE PROVISION OF SERVICES BY INCUMBENT CARRIERS TO THEIR RESPECTIVE WHOLESALE CUSTOMERS IS NOT "COMPETITIVELY NEUTRAL"

In order to comply with section 253 (b) of the Telecommunications Act of 1996, ("Act") any service quality rules promulgated by this Commission must be competitively

neutral. As indicated in the quotation from the Commission's order included in the Introduction to these Initial Comments, the Commission's contemplated rules would only apply to Incumbent Local Exchange Carriers ("ILECs"). As currently posed, the Commission's intent to ensure local exchange telecommunications competition by imposing wholesale service quality requirements only on ILECs is not "competitively neutral" and, therefore, conflicts with the Act. In the future, ILECs will also be purchasing services from Competitive Local Exchange Carriers ("CLECs"). In some instances, ILECs might not even have access to end-user customers because a CLEC has replaced them or displaced them as the end-user customers with a CLEC. An even more immediate likelihood is that CLECs will provide services to each other in order to increase their market coverage and services offered. Yet, as currently posed, the standards contemplated by the Commission will not cover any of these situations because the ILEC is not the service provider. The Commission's rule should help to foster competition to all Nebraska citizens irrespective of whether their provider is an ILEC or a CLEC.

In order to fulfill the mandates of the Act, U S WEST suggests that this Commission apply any wholesale local exchange service quality standards to, at minimum, all wireline facilities-based providers, regardless of whether the facilities transmit communications over copper, fiber, or coaxial cable. More comprehensively, as discussed in section III, below, this Commission should consider making its contemplated standards applicable to all facilities-based and "mixed" facilities-based local exchange carriers ("LECs") in the State of Nebraska.

The primary underlying purpose of service quality standards is to ensure that Nebraska consumers receive near-seamless quality service regardless who their selected (and sometimes unknown) provider(s) might be. This underlying purpose is fulfilled if the Commission's contemplated service quality standards are made applicable to all facilities-based and "mixed" facilities-based LECs doing business in the State of Nebraska. It is in the public interest to broaden the application of these contemplated

service quality rules to all facilities-based and "mixed" facilities-based LECs or, at minimum, all facilities-based LECs.

In other forums, CLECs have argued that the primary underlying purpose of wholesale service quality standards is to prevent ILECs from thwarting competition by giving CLECs poor service. The CLECs, however, fail to demonstrate the inadequacy of the two ILEC-required performance standards set forth in the Telecommunications Act of 1996 ("Act"), the first being a standard of non-discrimination[1], and the second being one which requires and ILEC to provide interconnection service at least equal in quality to that which the ILEC provides to itself.[2] These two standards are "competitively neutral." To impose additional standards only on ILECs is not "competitively neut Commission should reconsider taking such an approach.

CLECs have also argued that neither wholesale nor retail service quality requirements should be imposed upon them because, they allege, the burdens and costs associated with the rules discourage carriers from entering local markets. However, this argument is not supported by any evidence. Moreover, a predicate to entering the local exchange market should be an understanding that quality service is expected and required. Finally, this argument ignores the inherent value in and the Commission's mandate to protect all Nebraska customers and to regulate LECs in a competitively neutral manner.

III. ANY COMMISSION ESTABLISHED PERFORMANCE MEASUREMENTS SHOULD BE GUIDELINES AND SHOULD FOCUS ON THE MOST CRITICAL ACTIVITIES PERFORMED BY A FACILITIES-BASED LEC OR "MIXED" FACILITIES-BASED LEC ON BEHALF OF ANY OTHER LEC

[1] 47 U.S.C § 251 (b)(1) and 251(c)(3)
[2] 47 U.S.C § 251 (c)(2)(C)

A. The Commission Should Address Wholesale Service Quality in "Guidelines" Rather Than Standards

Wholesale service performance quality should be addressed in contracts between the LECs, rather than by the Commission setting forth mandatory standards in its rules. To the extent that the Commission wishes to establish or otherwise address wholesale service performance, the Commission should only establish wholesale service quality "guidelines." Providing wholesale services quality guidelines is complementary to requiring all LECs to be held to minimum standards of retail service quality. Establishing wholesale service quality guidelines is appropriate because, in the long-run, competition will drive wholesale providers toward providing cheaper service with better quality to both their wholesale and retail customers.

"Guidelines" are appropriate because they can serve as a reference point to determine reasonable expectations. They should not be determinative, however, if the interconnecting LECs can reach agreement on what is reasonable, given their individual circumstances. In the short-run, the LECs can best determine what levels of service are desirable, and affordable. As discussed in part in Section II, above, with regard to the ILEC's level of wholesale service, the law only requires that the ILEC provide non-discriminatory service interconnection and access to unbundled network elements. For resold service and services where there is a retail analogue, ILECs must provide access to competing carriers in a manner that is non-discriminatory to that which the ILEC provides to itself. Where there is no retail analogue such as with unbundled network elements, the ILEC must provide the element-related or like service, in a manner that allows an efficient competitor a reasonable opportunity to compete. Prescribed wholesale levels are neither required, nor necessary.

B. For Facilities-Based LECs (Telephony and Cable)

As the Commission is aware, for the past several months U S WEST has participated in wholesale service performance workshops under the auspices of the

Regional Oversight Committee ("ROC"). Representatives from state regulatory commissions as well as many CLECs regularly participate in those workshops. As a result of the ROC workshops, U S WEST, the ROC representatives, and the participating CLECs have agreed to numerous and detailed performance standards for wholesale telecommunications performance. The scope of the performance measurements agreed to in the ROC workshops is broad enough to provide both significant network and operations' results, as well as diagnostic information.

U S WEST proposes that several significant performance measurements already discussed in the ROC workshops which examine network and wholesale transactions results be adopted by the Commission for the following product and subject areas:

Resold Residence Basic Lines;
Resold Business Basic Lines;
Resold "Centrex" Lines;
Unbundled Analog Loops;
Unbundled Digital Loops;
Interconnection Trunks'
Collocation;
Number Portability;
OSS Gateway Performance; and
Billing.

U S WEST proposes that the following or similar performance measurements and guidelines be applied, to all facilities-based LECs, consistent with the agreements made in the ROC workshops:

1. For Resold Residence, Business, "Centrex" lines
   - Installation Commitments Met (OP-3) with the guideline directing a comparison to the provider's "retail" results. (Exhibit E)
   - Installation Intervals (OP-4) with the guideline directing a comparison to the provider's "retail" results. (Exhibit F)

- Out of Service Cleared Within 24 Hours (MR-3) with the guideline directing a comparison to the provider's "retail" results. (Exhibit H)

2. For Unbundled Loops –
   - Installation Commitments Met (OP-3) with the guidelines directing a comparison to a variety of the provider's retail results, more particularly described in Exhibit E, hereto.
   - Installation Intervals (OP-4) with the guidelines directing a comparison to a variety of the provider's retail results, more particularly described in Exhibit F, hereto.
   - Out of Service Cleared Within 24 Hours (MR-3) with the guidelines directing a comparison to a variety of the provider's retail results, more particularly described in Exhibit H, hereto.

3. For Interconnection Trunks –
   - Trunk Blocking (NI-1) with the guideline directing a comparison to the provider's interoffice trunk results. (Exhibit K)
   - Installation Commitments Met (OP-3) with the guideline directing a comparison to the provider's interoffice trunk results. (Exhibit E)

4. For Collocation (New & Augmented; Physical & Non-Physical)
   - Installation Intervals (CP-1) with the guideline being on average 90 calendar days. (Exhibit L)
   - Commitments Met (CP-2) with the guideline being 90%. (Exhibit M)

5. For Number Portability -
   - Timeliness of coordinated cuts (OP-8B) with the guideline being 95% within the "scheduled start time." (Exhibit G)
   - Timeliness of non-coordinated cuts (OP-8C) with the guideline being 95% set prior to the Frame Due Time. (Exhibit G)

6. For Operational Support Systems (OSS) Gateway Performance; and
    - Gateway Availability (GA-1) with the guideline being the gateway(s) made available 99.25% of scheduled availability time. (Exhibits A-D)

7. For Billing to other LECs –
    - Invoice Timeliness (BI-2) with the guideline being invoices issued 99% within 10 calendar days. (Exhibit I)
    - Billing Accuracy-Adjustments for Errors (BI-3) with the guideline directing a comparison with the provider's retail bills, and 95% accuracy in the case of reciprocal compensation bills. (Exhibit J)

These performance indicators are described in greater detail in the attached performance indicator definitions (Exhibits A through M) which are incorporated herein, by reference.

While each facilities-based LEC may not currently have these exact performance measurements, the Commission should mandate that all facilities-based LECs providing services to other LECs disclose for their retail and wholesale operations what their average intervals and standards for installation are, what percentage of the time they meet their installation commitments, what their performance results are relative to their performance objectives for restoring "out of service" conditions, what is their level of operational support system availability (to the extent that operational support systems are made available to other LECs) and what is the timeliness and accuracy of the billing data they transmit to another LEC for the receiving LEC's to use to bill the receiving LEC's end-user customers.

Because local exchange telecommunications competition is relatively new, U S WEST urges the Commission to consider adopting guidelines reasonable for each facilities-based LEC. U S WEST believes that a LEC's initial proposal should be presumed to be reasonable given each facilities-based LEC's experience in providing telephony services in Nebraska and possibly elsewhere. This presumption may be

rebutted by other LECs which rely upon the facilities-based LECs to provide the relying LECs with underlying facilities or services. Although each facilities-based LEC may propose different guidelines, such an outcome is not unreasonable given the varying processes, equipment and other plant conditions of each LEC. Additionally, the guidelines should not be applied in the absence of facilities or if a LEC's performance is hindered for reasons outside the LEC's control, such as "force majuere," "customer," or

The measurements and guidelines proposed by U S WEST are reasonable. Not only do U S WEST's proposed measurements and guidelines reflect its experience and near-term expectations, these proposed measurements and guidelines also reflect the outcome of negotiations and discussions in the ROC workshops with other LECs and representatives of the state regulatory commissions. Therefore, the Commission should adopt the U S WEST proposed measurements and guidelines for application to U S WEST.

C. For "Mixed" Facilities-Based LECs

Unlike U S WEST, which is a facilities-based LEC currently using only its own facilities, there are also LECs which currently use, and will use in the future, both their own facilities and those of other facilities-based LECs to provide services to end-user customers. These "mixed" facilities-based LECs, in turn, may resell finished services to other LECs. They might also provide unbundled network elements which they own to other LECs. Over time, this Commission will likely see more examples of "mixed facilities-based companies than it does today. Although managing quality in this environment will be a greater challenge in the future, that does not mean that this challenge should be ignored for now.

U S WEST proposes that the wholesale-related activities and services of "mixed" facilities-based providers be subject to the same performance measurements, guidelines, and reporting requirements that facilities-based LECs would become subject to, as

discussed in Section III, B, above. While "mixed" facilities-based LECs may be able to justify differing intervals as discussed in Section III, B, above, they are not justified in avoiding wholesale service quality measurements and standards completely when other LECs will rely on them in order to support the other LECs' end-user customers

Transactions between LECs are already happening in and from collocated space. In time, other facilities such as loops and dark fiber will be leased to other LECs by mixed facilities-based LECs and CLECs, just as ILECs are leasing facilities to CLECs today. For the foregoing reasons, to fulfill its mandate to oversee local telecommunications quality, this Commission should apply service performance measurements and guidelines to "mixed" facilities-based LECs to the same extent that the Commission applies such measurements and guidelines to facilities-based LECs.

IV. CONFIDENTIAL AND PERIODIC PERFORMANCE REPORTING TO THE COMMISSION

U S WEST does not believe that this Commission should require any reports, regardless whether the Commission mandates a certain level of performance or, as proposed by U S WEST, the Commission adopts guidelines. In many instances, CLECs receive performance measurements reports from their suppliers and, in the case of disputes, such data may be subject to discovery and may possibly be admitted into evidence in a contested case before this Commission. Therefore, U S WEST recommends that the Commission not require any LEC to regularly report its service performance results to the Commission.

If the Commission is inclined to receive reports, however, U S WEST recommends that LECs confidentially provide the Commission with service performance measurement results relating to each of the subject matter described in Section III, above, on a quarterly basis until January 2002. After January 2002, service performance measurements results should be provided by the LECs only upon specific request of the Commission.

U S WEST's recommendation is based upon the view that the role of this Commission regarding wholesale service quality will migrate from more of a quasi-legislative role today to more of a quasi-judicial role in the future. Therefore, U S WEST acknowledges that the Commission may initially wish to receive data more frequently to support the Commission's quasi-legislative role of establishing and monitoring wholesale service quality. Thereafter, because the Commission's role would evolve toward a quasi-judicial role, the frequency of regularly reported data would be reduced until regular reporting eventually would be stopped.

As is the same case today, the Commission would not be hindered in its quasi-judicial role in the absence of frequent or even any regular reports. In the event that this Commission were called upon to resolve a service quality dispute between two LECs, the parties would present their evidence to the Commission. That evidence might include service performance results, if material and relevant. Therefore, in such instance, the Commission would still have access to the service performance data, even though the data had not been previously reported to the Commission on a quarterly basis.

Finally, U S WEST urges the Commission's adoption of its proposal as an aid to the advancement of competition. The gathering and periodic reporting of data to regulatory commissions and other LECs is costly. In order to further their competitive standing, each LEC would like to reduce its costs structure. Over time as the need to provide reports is lessened, the Commission can further competition by reducing each LEC's costs of regulatory compliance.

V. ENFORCEMENT OF COMMISSION REQUIRED STANDARDS FOR WHOLESALE SERVICES PERFORMANCE

Although comments concerning the enforcement of Commission required standards for wholesale services performance are not required in this docket, it has been U S WEST's experience that whenever the subject of wholesale service quality is

discussed "enforcement" is inevitably discussed as well. Therefore, U S WEST makes the following comments regarding the use and enforcement of performance standards:

A. The Commission's Emphasis Should Be On Remediation, Not Punishment

The primary emphasis of the Commission should be on remediation of any alleged wholesale services performance deficiencies, rather than punishment. Thus, if a wholesale services performance issue arises, the allegedly offending LEC should be allowed a reasonable opportunity to determine whether a violation of the Commission's rules has taken place, the possible causes of the violation and possible solutions to the violation. Assuming that there are possible solutions, the allegedly offending LEC should also be allowed a reasonable opportunity to implement the possible solutions. To assess monetary damages, bill credits, etc. prior to these aforementioned opportunities to investigate and correct alleged violations is both counterproductive and may be a violation of a LEC's rights of due process, particularly if there was no violation, or any alleged violations were not the accused LEC's fault.

B. Financial Assessments For Alleged Violations

The most popular common form of remedy advocated by CLECs has been "self-executing" bill credits in which the alleged violating LEC would provide a CLEC a discount from the price of its wholesale service's telephone bill from the LEC. CLECs seek bill credits even though they also seek penalties assessable to the ILEC payable to the CLEC for the ILEC allegedly violating the Commission's rules.

First, such an approach of "self-executing" remedies in which the cause of an alleged violation is not factually determined and adjudged prior to the LEC having an opportunity to be heard may well be a violation of the LEC's due process. It is very possible that the cause for a violation may have been the result of CLEC actions rather

than ILEC actions. This is especially problematic when "self-executing" remedies are either the exclusive, or a non-correctable process or remedy, for alleged violations of Commission rules.

Second, U S WEST believes that monetary assessments are a wasteful diversion of those financial resources which otherwise could or would be utilized to improve wholesale service performance, or otherwise investing in the public switched telephone network. Thus, if there were a violation of the Commission's rules, U S WEST urges the Commission to review U S WEST's operational remedies, rather than assess damages, and monitor U S WEST's implementation of those operational remedies.

Third, even if the Commission believes that there should be a financial assessment against a LEC for violating the Commission's wholesale services quality rules, such an assessment should be determined by contracts between the LECs and subject to whatever terms the contracting LECs voluntarily agree. Alternatively, any Commission prescribed remedy should be subject to an offset for any amount paid to adversely affected LECs for alleged violations of the service quality rules.

The Commission should rely upon the LECs for service quality enforcement, even to the extent that such enforcement includes the subject matter, if not the content, of Commission-established rules. There should not be a duplication of enforcement activities, including evaluations, audits or monetary assessments between this Commission, other LECs, and perhaps, the FCC. Therefore, any prescribed remedy by this Commission should offset assessments from the FCC or bill credits or other financial remedies provided to other LECs for the same alleged rules violations, and vice versa.

Fourth, any payments made should be roughly analogous to actual damages agreed to during and under normal circumstances, rather than "punitive," or "penalty" payments. Alternatively, the amount of an assessment should be based upon the failure to reach a prescribed average level for a measurement category, rather than on a per occurrence basis.

Fifth, any performance credit plan should be easy to administer and should focus on significant outcomes. CLECs have previously suggested complicated formulas and indexes which inevitably lead to disputes concerning administration. With plans that are simple to administer, the LEC's focus can be on improvement of results rather than formulaic computations. If the most significant outcomes are the subject of the rules, then with improvement of those outcomes, end-user customers ultimately may benefit.

Finally, any bill credits or other payments ordered by the Commission should either benefit the state's citizens through tax relief, public works, subsidies to public projects, or be refunded to end-user customers. It is inappropriate for the Commission to order payments be made to a LEC without a requirement that the end-users receive a rebate for such payments. Otherwise, the bill credits or payments can simply be a windfall which benefits the shareholders of the receiving LEC, rather than Nebraska's citizens.

VI. Conclusion

This Commission should adopt rules that are competitively neutral. If this Commission chooses to adopt rules, they should be applied to both facilities-based LECs and "mixed" facilities-based LECs, and such rules should focus on the results of key products and process. Although U S WEST does not believe that this Commission needs to receive wholesale services performance reports, if the Commission chooses to receive such reports, it should only do so for a limited period of time.

The Commission's direction concerning wholesale services performance quality should be in the form of "guidelines," not requirements. The Commission's focus should be on remediation, not punishment. Any financial assessment should not be punitive and should directly benefit end-user customers. Finally, any financial assessments should be part of a plan that is easy to administer and focuses on only the most important aspects of wholesale service performance.

Date: May 3, 2000.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

_____

Todd L. Lundy
1801 California Street, Suite 5100
Denver, Colorado 80202
(303) 672-2783

Electronic Gateway Availability

GA-1 – Gateway Availability – IMA-GUI[1]

Purpose:
Evaluates the quality of CLEC access to the IMA electronic gateway and two associated systems, focusing on the extent they are actually available to CLECs.

Description:

GA-1A: Measures the availability of the IMA (Interconnect Mediated Access) interface, including the Firm Order Manager (FOM), and reports the percentage of scheduled up time the IMA interface is available for view and/or input.

- For provisioning preorder transactions, the current "scheduled up time" hours are 6 a.m. to 8 p.m. MT, Monday through Sunday.
- For repair transactions, the current scheduled up time hours are 2:15 a.m. to 11:15 p.m. MT, Monday through Friday; 2:15 a.m. to 10:00 p.m. MT on Saturday; and 7:00 a.m. to 11:15 p.m. MT on Sunday.

GA-1B: Measures the availability of the "Fetch-N-Stuff" system, which facilitates access for the IMA-GUI interface and the IMA-EDI interface (see GA-2), and reports the percentage of scheduled time the Fetch-N-Stuff system is available. Scheduled times will be no less than the same hours as listed for IMA and EDI.

GA-1C: Measures the availability of the Data Arbiter system, which facilitates access for the IMA-GUI interface and the IMA-EDI interface (see GA-2), and reports the percentage of scheduled time the Data Arbiter system is available. Scheduled times will be no less than the same hours as listed for IMA and EDI.

- Scheduled down time is time identified and communicated that the interface is not available due to maintenance and/or upgrade work.
- When figuring scheduled available time, the scheduled down time is subtracted from the committed available hours.

Reporting Period: One month	**Unit of Measure:** Percent
Reporting Comparisons: CLEC aggregate results	**Disaggregation Reporting:** Region-wide level. Results will be reported as follows: GA-1A IMA Graphical User Interface Gateway GA-1B "Fetch–N-Stuff" system GA-1C Data Arbiter system

Formula:

[Number of Hours and Minutes Gateway is Available to Competing Carriers During Reporting Period / Number of Hours and Minutes Gateway was Scheduled to be Available During Reporting Period] x 100

Exclusions: None

Product Reporting: None	**Standard:** 99.25 percent
Availability: • Available	**Notes:**

[1] Graphical User Interface

GA-2 – Gateway Availability – IMA-EDI

Purpose:

Evaluates the quality of CLEC access to the EDI electronic gateway, focusing on the extent the gateway is actually available to CLECs.

Description:

Measures the availability of EDI (Electronic Data Interchange) interface and reports the percentage of scheduled up time the EDI Interface is available for view and/or input. All times during which the interface is scheduled to be operating during the reporting period are measured.

- Scheduled up time hours are 6 a.m. to 8 p.m. MT Monday through Sunday.
- Scheduled down time is time identified and communicated that the interface is not available due to maintenance and/or upgrade work.
- When figuring scheduled available time, the scheduled down time is subtracted from the committed available hours.

Reporting Period: One month	**Unit of Measure:** Percent
Reporting Comparisons: CLEC aggregate results	**Disaggregation Reporting:** Region-wide level. (See GA-1 for reporting of "Fetch-n-Stuff" and Data Arbiter systems availability.)

Formula:

[Number of Hours and Minutes Gateway is Available to Competing Carriers During Reporting Period / Number of Hours and Minutes Gateway was Scheduled to be Available During Reporting Period] x 100

Exclusions: None

Product Reporting: None	**Standard:** 99.25 percent
Availability: Available	**Notes:**

GA-3 – Gateway Availability – EB-TA

<table>
<tr><td colspan="2">Purpose:
Evaluates the quality of CLEC access to the EB-TA interface, focusing on the extent the gateway is actually available to CLECs.</td></tr>
<tr><td colspan="2">Description:
Measures the availability of EB-TA (Electronic Bonding – Trouble Administration) interface and reports the percentage of scheduled up time the EB-TA Interface is available.
The current scheduled up time hours are 24 hours a day, Monday through Friday; midnight to 11 p.m. MT on Saturday; 5 am to midnight MT on Sunday.
Scheduled down time is time identified and communicated that the interface is not available due to maintenance and/or upgrade work.</td></tr>
<tr><td>Reporting Period: One month</td><td>Unit of Measure: Percent</td></tr>
<tr><td>Reporting Comparisons: CLEC aggregate results</td><td>Disaggregation Reporting: Region-wide level.</td></tr>
<tr><td colspan="2">Formula:
[Number of Hours and Minutes Gateway is Available to Competing Carriers During Reporting Period / Number of Hours and Minutes Gateway Scheduled to be Available During Reporting Period] x 100</td></tr>
<tr><td colspan="2">Exclusions: None</td></tr>
<tr><td>Product Reporting: None</td><td>Standard: 99.25 percent</td></tr>
<tr><td>Availability: Available</td><td>Notes:</td></tr>
</table>

GA-4 – System Availability – EXACT

Purpose: Evaluates the quality of CLEC access to the EXACT electronic access service request system, focusing on the extent the gateway is actually available to CLECs.	
Description: Measures the availability of EXACT system and reports the percentage of scheduled up time the EXACT system is available. • Scheduled up time hours are 6 a.m. to 7 p.m. MT, Monday through Friday; and 7 a.m. to 5 p.m. MT on Saturday. • Scheduled down time is time identified and communicated that the system is not available due to maintenance and/or upgrade work.	
Reporting Period: One month	**Unit of Measure:** Percent
Reporting Comparisons: CLEC aggregate results	**Disaggregation Reporting:** Region-wide level.
Formula: [Number of Hours and Minutes EXACT is Available to Competing Carriers During Reporting Period / Number of Hours and Minutes EXACT was Scheduled to be Available During Reporting Period] x 100	
Exclusions: None	
Product Reporting: None	**Standard:** 99.25 percent
Availability: Available	**Notes:**

OP-3 – Installation Commitments Met

Purpose:
Evaluates the extent to which U S WEST installs services for Customers by the scheduled due date.

Description:
Measures the percentage of orders for which the scheduled due date is met.

- All inward orders (Change, New, and Transfer order types) assigned a due date by U S WEST and completed/closed during the reporting period are measured, subject to exclusions specified below. These include orders with customer-requested due dates longer than the standard interval.
- Completion date on or before original due date is counted as a met due date.

Reporting Period: One month	**Unit of Measure**: Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for non-designed services will be disaggregated and reported according to orders involving: OP-3A Dispatches within MSAs; OP-3B Dispatches outside MSAs; and OP-3C No dispatches. • Results for designed services, except analog unbundled loops, will be disaggregated according to installations: OP-3D In High Density areas; and OP-3E In Low Density areas. • Results for analog unbundled loops will be reported in aggregate (as "OP-3 Analog Loops aggregate") to facilitate comparison with Residence and Business POTS, with dispatch, which will be reported both in aggregate (as "OP-3 Res & Bus POTS aggregate with dispatch") and separately, as specified under OP-3A through -3C above.

Formula:
[(Total Orders completed on Original Due Date) / (Total Orders Completed)] x 100

Explanation: The percent commitments met is obtained by dividing the total number of service orders completed on the original due date by the total number of service orders completed during the measurement period.

Exclusions:

- Disconnect, From (another form of disconnect) and Record order types.
- Due dates missed for standard categories of customer reasons. Standard categories of customer reasons are: previous service at the location did not have a customer-requested disconnect order issued, no access to customer premises, or customer requested a later due date when the technician arrived to do the work.

OP – 3 Installation Commitments Met (continued)

Product Reporting:	**Standards:**
Non-designed Wholesale Services -	
• Resale – Non-designed	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex (non-designed only)	Parity with retail service
PBX Trunks	Parity with retail service
DID	Parity with retail service
Basic ISDN	Parity with retail service
ADSL (MegaBit)	Parity with retail service
• Unbundled Network Element – Platform (UNE-P) (non-designed only)	Parity with like non-designed retail service
Designed Wholesale Services -	
• Resale - Designed	
Primary ISDN	Parity with retail service
Centrex (designed only)	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks (separately reported)
• Unbundled Dedicated Interoffice Transport (UDIT)	Private Line:
UDIT – DS1 level	Parity with DS1 Private Line-
UDIT – Above DS1 level	Parity with Private Line- above DS1 level
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS with dispatch
Non-loaded Loop (2-wire)	Parity with retail ISDN BRI (designed)
Non-loaded Loop (4-wire)	Parity with retail DS1 (designed)
DS1-capable Loop	Parity with retail DS1 (designed)
ISDN-capable Loop	Parity with retail ISDN BRI (designed)
ADSL-qualified Loop	Parity with retail MegaBit (non-designed) with dispatch
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks (designed)
• Unbundled Network Element – Platform (UNE-P) (designed only)	Appropriate retail service
Availability: Available: –	**Notes:**

OP-4 – Installation Interval

Purpose:
Evaluates the timeliness of U S WEST's installation of services for customers, focusing on the average time to install service.

Description:
Measures the average interval (in business days) between the application date and the completion date for service orders accepted and implemented.

- All inward orders (Change, New, and Transfer order types) assigned a due date by U S WEST and which are completed/closed during the reporting period are measured, subject to exclusions specified below.
- Intervals for each measured event are counted in whole days: the application date is day zero (0); the day following the application date is day one (1).

Reporting Period: One month	**Unit of Measure**: Business Days

Reporting Comparisons:	**Disaggregation Reporting:** Statewide level.
CLEC aggregate, individual CLEC and U S WEST Retail results	• Results for non-designed services will be disaggregated and reported according to orders involving: OP-4A Dispatches within MSAs; OP-4B Dispatches outside MSAs; and OP-4C No dispatches. • Results for designed services, except analog unbundled loops, will be disaggregated according to installations: OP-4D In High Density areas; and OP-4E In Low Density areas. • Results for analog unbundled loops will be reported in aggregate (as "OP-4 Analog Loops aggregate") to facilitate comparison with Residence and Business POTS, with dispatch, which will be reported both in aggregate (as "OP-4 Res & Bus POTS aggregate with dispatch") and separately, as specified under OP-4A through -4C above.

Formula:
Σ[(Order Completion Date) – (Order Application Date)] / Total Number of Orders Completed

Explanation: The average installation interval is derived by dividing the sum of installation intervals for all orders (in business days) by total number of service orders completed in the reporting period.

Exclusions:

- Orders with customer requested due dates greater than the current standard interval. (This exclusion does not apply to LIS trunks, for which orders for all requested intervals are included.)
- Orders with intervals lengthened due to customer-caused delays.
- Disconnect, From (another form of disconnect) and Record order types.

OP-4 – Installation Interval (continued)

Product Reporting:	**Standards:**
Non-designed Wholesale Services -	
• Resale – Non-designed	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex (non-designed only)	Parity with retail service
PBX Trunks	Parity with retail service
DID	Parity with retail service
Basic ISDN	Parity with retail service
ADSL (MegaBit)	Parity with retail service
Unbundled Network Element – Platform (UNE-P) (non-designed only)	Parity with like non-designed retail service
Designed Wholesale Services -	
• Resale – Designed	
Primary ISDN	Parity with retail service
DS0	Parity with retail service
Centrex (designed only)	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
• LIS Trunks	Diagnostic (Parity with U S WEST Interoffice Trunks (separately reported) is expected, subject to evaluation of the impact of customer-requested long intervals.)
• Unbundled Dedicated Interoffice Transport (UDIT)	Private Line:
UDIT – DS1 level	Parity with DS1 Private Line- Service
UDIT – Above DS1 level	Parity with Private Line- Services above DS1 level
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS with dispatch
Non-loaded Loop (2-wire)	Parity with retail ISDN BRI (designed)
Non-loaded Loop (4-wire)	Parity with retail DS1 (designed)
DS1-capable Loop	Parity with retail DS1 (designed)
ISDN-capable Loop	Parity with retail ISDN BRI (designed)
ADSL-qualified Loop	Parity with retail MegaBit (non-designed) with dispatch
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks (designed)
• Unbundled Network Element – Platform (UNE-P) (designed only)	Appropriate retail service
Availability: Available: •	**Notes:**

OP-4 – Installation Interval (continued)

Under Development: • Unbundled Loops – Analog: change application date to eliminate 3 p.m. cutoff – Apr 00	

OP-4 – Installation Interval (continued)

OP-8 – Number Portability Timeliness

Purpose:
Evaluates the timeliness of cutovers of local number portability (LNP).

Description:

OP-8B – Coordinated Local Number Portability (LNP) Timeliness (percent): Measures the percentage of coordinated LNP triggers set prior to the scheduled start time for the loop.

- All orders for LNP coordinated with unbundled loops that are completed/closed during the reporting period are measured, subject to exclusions specified below.
- "Scheduled start time" is defined as the confirmed appointment time (as stated on the FOC), or a newly negotiated time.

OP-8C – Non-Coordinated LNP Triggers Set on Time (percent): Measures the percentage of LNP triggers set prior to the Frame Due Time established by the CLEC when placing the order.

- All orders for LNP for which coordination was not requested are included.
- For purposes of these measurements (OP-8B and -8C), "trigger" refers to the "10-digit unconditional trigger" or Line Side Attribute (LSA) that is set or translated by U S WEST.

Reporting Period: One month	**Unit of Measure:** Percent of triggers set on time
Reporting Comparisons: CLEC aggregate and individual CLEC results	**Disaggregation Reporting:** Statewide level.

Formula:

OP-8B = [(Number of LNP triggers set before the loop "lay" time) / (Total Number of LNP activations coordinated with unbundled loops completed)] x 100

OP-8C = [(Number of LNP triggers set before the Frame Due Time) / (Total Number of LNP activation completed)] x 100

Exclusions: CLEC-caused delays in trigger setting.

Product Reporting: None	**Standard:** 95%
Availability: Under Development – Mar 00	**Notes:**

MR-3 – Out of Service Cleared within 24 Hours

Purpose:
Evaluates timeliness of repair for non-designed services and analog loops, focusing on cases where the out-of-service cases were closed within the standard estimate for non-designed services (i.e., 24 hours for out-of-service conditions).

Description:
Measures the percentage of trouble reports, involving non-designed services, that are cleared within 24 hours of receipt of trouble reports from CLECs or from retail customers.

- Includes all trouble reports, closed during the reporting period, which involve a non-designed service that is out-of-service (i.e., unable to place or receive calls), subject to exclusions specified below.
- Time measured is from date and time of receipt to date and time trouble is indicated as cleared.

Reporting Period: One month	**Unit of Measure:** Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for listed products, except analog unbundled loops, will be disaggregated and reported according to trouble reports involving: MR-3A Dispatches within MSAs; MR-3B Dispatches outside MSAs; and MR-3C No dispatches. • Results for analog unbundled loops will be reported in aggregate (as "MR-3 Analog Loops aggregate") to facilitate comparison with Residence and Business POTS, which will be reported both in aggregate (as "MR-3 Res & Bus POTS aggregate") and separately, as specified under MR-3A through -3C above.

Formula:
(Number of Out of Service Trouble Reports Closed within 24 hours) / (Total Number of Out of Service Trouble Reports Received) x 100

Explanation: Percentage is obtained by dividing the total number of OOS reports closed within 24 hours by the total number of OOS reports received during the measurement period.

Exclusions:

- Trouble reports with disposition codes for (6) – Customer Action; (11) – non-Telco plant; (12) – Trouble Beyond the Network Interface and (13) – Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider.
- Subsequent trouble reports (i.e., redundant reports for the same trouble before it is closed).
- Information tickets generated for internal U S WEST system/network monitoring purposes.
- Time delays due to "no access" are excluded from repair time.
- Reports of problems received on day of installation before provisioning order is closed as complete.

MR-3 – Out of Service Cleared within 24 Hours (Continued)

Product Reporting: • Resale:	**Standards:**
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
PBX Trunks	Parity with retail service
DID	Parity with retail service
Basic ISDN	Parity with retail service
ADSL (MegaBit)	Parity with retail service
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS
ADSL-qualified Loop	Parity with retail MegaBit (non-designed)
• Unbundled Network Element – Platform (UNE-P) (non-designed only)	Appropriate non-designed retail service
Availability: Available: –	**Notes:**

BI-2 – Invoices Delivered within 10 Days

<table>
<tr><td colspan="2">Purpose:
Evaluates the timeliness with which U S WEST delivers industry standard electronically transmitted bills to CLECs, focusing on the percent delivered within ten calendar days.</td></tr>
<tr><td colspan="2">Description:
Measures the percentage of invoices that are delivered within ten days, based on the number of days between the bill date and bill delivery.
• Includes all industry standard electronically transmitted invoices for local exchange services and toll, subject to exclusions specified below.</td></tr>
<tr><td>Reporting Period: One month</td><td>Unit of Measure: Percent</td></tr>
<tr><td>Reporting Comparisons: CLEC aggregate, individual CLECs, and U S WEST Retail results</td><td>Disaggregation Reporting: State level</td></tr>
<tr><td colspan="2">Formula:
(Count of Invoices for which Bill Transmission Date - Bill Date is ten calendar days or less)/(Total Number of Invoices)</td></tr>
<tr><td colspan="2">Exclusions: Bills transmitted via paper, magnetic tape, CD-ROM, diskette.</td></tr>
<tr><td>Product Reporting:
• UNEs and Resale</td><td>Standard:
99% within 10 calendar days</td></tr>
<tr><td>Availability:
• UNEs and Resale – March 00</td><td>Notes: Reciprocal Compensation MOUs will be added to Product Reporting if and when those bills are electronically transmitted.</td></tr>
</table>

BI-3 – Billing Accuracy – Adjustments for Errors

<table>
<tr><td colspan="2">Purpose:
Evaluates the accuracy with which U S WEST bills CLECs, focusing on the percentage of billed revenue adjusted due to errors.</td></tr>
<tr><td colspan="2">Description:
Measures the billed revenue minus amounts adjusted off bills due to errors, as a percentage of total billed revenue.
• Both the billed revenue and amounts adjusted off bills due to error are calculated from bills rendered in the reporting period.</td></tr>
<tr><td>Reporting Period: One month</td><td>Unit of Measure: Percent</td></tr>
<tr><td>Reporting Comparisons: CLEC aggregate, individual CLECs, and U S WEST Retail results</td><td>Disaggregation Reporting: State level.</td></tr>
<tr><td colspan="2">Formula:
∑(Revenue Billed without Error)/(Total Billed Revenue billed in Reporting Period)</td></tr>
<tr><td colspan="2">Exclusions:
• UNEs and Resale – None
• Reciprocal Compensation Minutes of Use – Billing adjustments as a result of CLEC-caused errors in return of minutes of use</td></tr>
<tr><td>Product Reporting:
• UNEs and Resale
• Reciprocal Compensation Minutes of Use (MOU)</td><td>Standard:
• UNEs and Resale: Parity with U S WEST retail bills.
• Reciprocal Compensation (MOU) – 95%</td></tr>
<tr><td>Availability:
Available
Reciprocal Compensation (MOU): January 00 data
Under Development
UNEs and Resale: March 00 data</td><td>Notes:</td></tr>
</table>

NI-1 – Trunk Blocking

Purpose:
Evaluates factors affecting completion of calls from U S WEST end offices to CLEC end offices, compared with the completion of calls from U S WEST end offices to other U S WEST end offices, focusing on average busy-hour blocking percentages in interconnection or interoffice final trunks.

Description:
Measures the percentage of trunks blocking in interconnection and interoffice final trunks.

- Includes blocking percentages on all direct final and alternate final interconnection and interoffice trunk groups that are in service during the reporting period, subject to exclusions specified below.

Reporting Period: One month	**Unit of Measure:** Percent Blockage
Reporting Comparisons: U S WEST network results, CLEC aggregate and individual CLEC results.	**Disaggregation Reporting:** Statewide level. Reports the percentage of trunks blocking in interconnection final trunks, reported by: NI-1A Interconnection (LIS) trunks to U S WEST tandem offices; NI-1B Interconnection (LIS) trunks to U S WEST end offices. Reports the percentage of trunks blocking in local interoffice final trunks, reported by: NI-1C Trunks connecting U S WEST end offices to U S WEST tandem offices; NI-1D Trunks connecting U S WEST end offices to other U S WEST end offices.

Formula:
[∑(Blockage in Final Trunk Group of Specified Type)(Number of Circuits in Trunk Group)] / (Total Number of Final Trunk Circuits in all Final Trunk Groups)

Explanation: Actual average percentage of trunk blockage is calculated by dividing the equivalent average number of trunk circuits blocking by the total number of trunk circuits in final trunks of the type being measured.

Exclusions:

- Toll trunks, non-final trunks, and trunks that are not connected to the public switched network.
- One-way trunks originating at CLEC end offices.
- U S WEST official services trunks, local interoffice operator and directory assistance trunks, and local interoffice 911/E911 trunks are included.

Product Reporting: None	**Standard:** Where NI-1A ≤ 1%: 1 % Where NI-1A > 1%: Parity with NI-1C Where NI-1B ≤ 1%: 1 % Where NI-1B > 1%: Parity with NI-1D
Availability: Available	**Notes:**

Collocation

CP-1 – Installation Interval

<table>
<tr><td colspan="3">Purpose:
Evaluates the timeliness of US WEST's installation of collocation arrangements for CLECs, focusing on the average time to complete such arrangements.</td></tr>
<tr><td colspan="3">Description:
Measures the interval between the receipt of the down payment from the CLEC and the completion of the collocation installation, expressed in calendar days.
• Includes all collocations assigned a Ready For Service (RFS) date by U S WEST and completed during the reporting period, subject to exclusions specified below.</td></tr>
<tr><td colspan="2">Reporting Period: One month</td><td>Unit of Measure: Calendar Days</td></tr>
<tr><td>Reporting Comparisons: CLEC aggregate and individual CLEC results</td><td colspan="2">Disaggregation Reporting: Statewide level.
Results for this indicator are disaggregated and reported as follows:
A-1 Virtual, Physical Caged, and Shared Collocation.
A-2 Augments to Virtual, Physical Caged, and Shared Collocations.
B-1 Cageless Collocations.
B-2 Augments to Cageless Collocations.</td></tr>
<tr><td colspan="3">Formula:
Σ[(Collocation Completion Date) - (Collocation Interval Start Date)] / (Total Number of Collocations Completed in Reporting Period)</td></tr>
<tr><td colspan="3">Exclusions:
• CLEC orders involving requests for RFS dates yielding longer than 90 calendar day intervals.
• RFS dates missed for CLEC-not-ready;
• RFS dates missed for CLEC equipment delays.</td></tr>
<tr><td colspan="2">Product Reporting:
• Virtual, Physical Caged, and Shared Collocation
• Cageless Collocation</td><td>Standard: 90 calendar days</td></tr>
<tr><td colspan="2">Availability: Available</td><td>Notes:</td></tr>
</table>

CP-2 – Installation Commitments Met

Purpose:
Evaluates the extent to which U S WEST completes collocation arrangements for CLECs as scheduled or promised.

Description:
Measures the percentage of collocation orders for which the Ready For Service (RFS) date is met.

- Includes all collocations assigned a RFS date by U S WEST and completed within the reporting period, including those with CLEC-requested RFS dates longer than the standard interval and those with extended RFS dates negotiated with the CLEC (including supplemented collocation orders that extend the RFS date).
- A collocation arrangement is counted as met under this measurement if its Collocation Completion Date is the same as, or earlier than, the assigned RFS date.
- For CLECs with interconnection agreements that specify collocation installation intervals, and for individually negotiated intervals, the agreed-upon interval is the one measured.
- For CLECs with interconnection agreements that do not specify collocation installation intervals, the intervals applied for this measurement will be 90 calendar days for all types of collocation and augments thereto.

Reporting Period: One month	**Unit of Measure**: Percent

Reporting Comparisons: CLEC aggregate and individual CLEC results	**Disaggregation Reporting:** Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual, Physical Caged, and Shared Collocation A-2 Augments to Virtual, Physical Caged, and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.

Formula:
[(Count of Collocations with Collocation Completion Dates that are the same as, or earlier than, the assigned Ready for Service Date) / (Total Number of Collocations Completed in the Reporting Period)] x 100

Exclusions:

- RFS dates missed for CLEC-not-ready;
- RFS dates missed for CLEC equipment delays.

Product Reporting:	**Standard:** 90 percent or more
• Virtual, Physical Caged, and Shared Collocation • Cageless Collocation	